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May 19, 1998

92-237


Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Dear Ms. Salas:

Enclosed is Radcliffe Telephone Company's Petition for Extension of Time Granted in Prior Waiver of the January 1, 1998 implementation date for 4-Digit CIC. Also enclosed is one copy to be stamped and returned in the enclosed self-addressed stamped envelope.

Any questions regarding this filing may be directed to Chris Pilgrim at (719)594-5828 or me at (503) 612-4409

Sincerely,



Jeffrey H. Smith

cc: Ed Drake, Radcliffe Telephone Company
Service List

Encl.

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Administration of the
North American Numbering Plan,
Carrier Identification Codes (CICs)

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CC Docket No. 92-237

**PETITION OF RADCLIFFE TELEPHONE COMPANY
FOR EXTENSION OF TIME GRANTED IN PRIOR WAIVER**

I. Introduction

Radcliffe Telephone Company, (hereafter "Radcliffe"), by its consultant, and pursuant to the Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, CC Docket No. 92-237, (hereafter "the Order"), hereby requests an extension of its temporary waiver of the requirement that all Local Exchange Carriers ("LECs") that are equal access complete upgrades to their switches to recognize four digit CICs by January 1, 1998.

In the Order, the FCC reaffirmed its requirement that LECs that provide equal access must convert their switches to accept four digit CICs by January 1, 1998. The FCC also extended the permissive period to June 30, 1998, during which three and four digit CICs would continue to be accepted.

In compliance with paragraph 24 of the FCC's Order on Reconsideration, Radcliffe sought relief of the FCC's conversion deadline of January 1, 1998, and was

granted a waiver until June 30, 1998.¹ Due to circumstances beyond its control, Radcliffe will be unable to meet the June 30, 1998 deadline. Radcliffe will identify these special circumstances that warrant a deviation from the Order and show that an extension of the waiver will serve the public interest. Also, Radcliffe will show good cause that a waiver of the Commission's Order is necessary and appropriate as well as in the public interest.

II. Background

Radcliffe became aware of the requirement to upgrade or change its current software generic to accommodate four-digit CIC and seven-digit CAC shortly after the FCC released its April, 1997 Order. Radcliffe had planned to upgrade its switch in the last quarter of 1998, prior to the April, 1997 Order being issued. Upon recognizing that the software generic 402.53 would not accommodate the CIC/CAC requirements, Radcliffe entered into negotiations with Nortel for an interim software generic that would comply with the CIC/CAC requirements.

Subsequent to the time the initial petition for waiver was submitted and granted, Radcliffe, INS and Nortel discussed a more viable and technically efficient network solution that would meet with the FCC's timeframe. The plan calls for a host/remote configuration, wherein INS would provide the host functions and capabilities through their DMS 100, and Radcliffe would replace the existing switch with a more current DMS 10 remote.

¹ *Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule*, NSD File Nos. 97-74; 97-63; 97-78; 97-75; 97-66; 97-67; 97-65; 97-68; 97-73; 97-70; 97-72; 97-76; 97-64; 97-71; 97-69, Order, DA 97-2691, rel. December 24, 1997.

III. A Waiver of the Commission Rules is Necessary and in the Public Interest

Radcliffe Telephone Company serves one exchange, Radcliffe, which provides services for approximately 515 access lines, two payphones and no hotel/motel lines. The exchange is currently served by a Nortel DMS 10 with the generic software version 402.53.

In order to comply with the FCC's order, Radcliffe requires, at minimum, an upgrade to the switch to the latest generic software level. The current software generic cannot accommodate these requirements as explained in Attachment 1.

Since the original petition for waiver, Radcliffe sought different alternatives to meet the Commission's deadline of June 30, 1998, while at the same time resolving the matter with a solution that would meet its network requirements. Working with both Nortel and INS, it was determined that a host/remote configuration using the INS DMS 100 as the host, with Radcliffe implementing a new DMS 10 remote would achieve the objectives of both the Commission and the Company. This alternative is more technically efficient when compared to implementing an interim software generic that would be replaced within a few months and cost the company \$12,000. On April 29, 1998, Nortel provided a firm schedule to begin installation of the remote switch on June 29, 1998, with a completion date of August 10, 1998 as shown in Attachment 2.

Radcliffe is committed to completing this project as quickly as possible and is reliant on Nortel's installation schedule to meet the CIC/CAC requirement. The above dates for completion of the upgrade installation do not consider the post turn-key testing. Therefore, Radcliffe requests that an extension be granted until August 31, 1998.

IV. Conclusion

Radcliffe has actively pursued a remedy and is scheduled to implement its network/switch upgrade to meet the FCC's requirement as soon as possible. Grant of this petition for extension will serve the public interest and will allow Radcliffe to complete its network upgrades and meet the FCC's CIC/CAC requirements and forego a cost of \$12,000 for an interim software patch. Radcliffe submits that the public interest will be better served by an extension of the waiver and that grant of this petition would be consistent with the policies underlying these rules. Good cause having been shown, Radcliffe Telephone Company respectfully requests the Commission grant the petition.

L.C. Pilgrim
Leslie Christina Pilgrim
Consultant, GVNW Inc./Management

5-19-98
Date

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**Radcliffe Telephone Company
Petition for Extension of Time Granted in Prior Waiver of the January 1, 1998
implementation date for 4-Digit CIC**

ATTACHMENT 1

Northern Telecom
1262 S. Stoncy Pointe Court
Sioux Falls, SD 57106

Tel 605-362-9874
Fax 605-362-1717

Facsimile

NORTEL
NORTHERN TELECOM

To: Ed Drake

Date: 5/15/97

Total Pages: 1

Company: Radcliffe Telephone Co.

Fax Number: 515-899-2499

From: Dave Nielson

This facsimile transmission is intended only for the use of the individual or entity to which it is addressed and may contain information which is privileged and confidential. If the reader of this message is not the intended recipient, or the employee responsible for delivering this communication to the intended recipient, you are hereby notified that any disclosure, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone to arrange for its return. Thank you.

MESSAGE:

Ed,

This memo is to inform you that the 4 digit CIC is not available in the 402.52 Generic.

If you have any further questions please do not hesitate to contact me at 605-362-9874.

Thanks,


Dave

Radcliffe Telephone Company
Petition for Extension of Time Granted in Prior Waiver of the January 1, 1998
implementation date for 4-Digit CIC

ATTACHMENT 2

Northern Telecom
475 North Martingale
Schaumburg, IL 60173

Tel. (847) 706-8413
FAX (847) 706-8662

NORTHERN TELECOM

April 29, 1998

Mr. Ed Drake
Radcliffe Telephone Company
P.O. Box 130
202 Isabella
Radcliffe, Iowa 50230-0130

Subject: **Radcliffe, IA**
References: **H2E067**

Dear Mr. Drake:

Northern Telecom Inc. is pleased to provide you with a firm schedule for the Initial RSCS at Radcliffe, Iowa.

The dates listed below are detailed in both the Nortel Calendar Week and the actual date:

<u>Activity</u>	<u>Week</u>	<u>Date</u>
CI (Customer Information)	98W16	April 24, 1998
D (Material Ship)	98W25	June 22, 1998
H (Installation Begins)	98W26	June 29, 1998
K (Installation Completed)	98W32	August 10, 1998

Once again, it is our pleasure to be of service to you and contribute to the success of this project. If there are any questions or concerns, please do not hesitate to contact me. We appreciate the opportunity to work with you in this endeavor.

Sincerely,

Terrell Turner

Terrell Turner
Senior Sales Engineer
Central Region